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November 13, 1996

VIA HAND DELIVERY

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

Re: In the Matter of Billed Party Preference for InterLATA 0+ Calls,
CC Docket No. 92-77

Dear Mr. Caton:

Enclosed please find an original and four (4) copies of comments submitted by One Call Communications, Inc. d/b/a OPTICOM in response to the Commission's Public Notice Requesting Further Comment issued in the above-referenced proceeding.

Please acknowledge receipt on the supplemental copy provided and remit same to the bearer.

Sincerely,

Victoria A. Schlesinger

VAS/jas
Enclosures

cc: International Transcription Services (ITS)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Billed Party Preference for	)	CC Docket No. 92-77
InterLATA 0+ Calls	)	

FURTHER COMMENTS OF ONE CALL COMMUNICATIONS, INC.
d/b/a OPTICOM

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Its Attorneys

Date: November 13, 1996

SUMMARY

The concept of cost is fundamental to a healthy marketplace, and access to cost information prior to purchase is expected by members of the consuming public. One of the basic tenants of our economic system is that both parties to a market transaction understand the terms of that transaction prior to its completion. In fact, Opticom can think of very few industries where disclosure at the point of purchase is not the normal practice.[1] Thus, consumers purchasing operator services should receive rate information prior to purchasing such services.

Currently, there are two technological systems capable of providing on-demand cost information to consumers purchasing operator services. Both types of rating systems can be implemented at a reasonable cost to operator service providers and in a timely manner. Moreover, on-demand call rating would create only a minimal delay in call processing. Specifically, the actual recitation of cost information will only result in a twelve (12) second call delay and the technology would allow consumers to voluntarily bypass this rate information. For these reasons, the Commission should adopt regulations requiring OSPs to provide on-demand rate information prior to call completion.

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[1] For example, regulated utilities and health care services.

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FURTHER COMMENTS OF ONE CALL COMMUNICATIONS, INC.
d/b/a OPTICOM

1. Are there any industries in which price disclosure to consumers at the point of purchase is not the normal practice? If so, what are those industries and what are the particular circumstances surrounding the developments of those industries?

One Call Communications, Inc. d/b/a Opticom ("Opticom") can identify very few industries in which price disclosure to consumers at the point of purchase is not the normal practice. In those rare instances, the costs and resulting rates are typically subject to heavy regulation. In a deregulated environment, however, healthy competition depends upon the availability and accuracy of market information to consumers. Without such information, consumers are unable to determine the lowest cost competitor, and hence, make educated purchasing decisions.

Like other industries, healthy competition in the operator services industry is dependent upon accessible market information and consumer education. Without the benefit of cost data (*i.e.*, rates), consumers will lack the information necessary to make informed choices. Rate disclosure at the time of purchase is the only effective means by which to ensure that consumers of operator services experience the benefits of competition in the industry.

2. What kinds of technologies (including payphone equipment and associated software) are currently available to provide on-demand call rating information for calls from payphones, other aggregator locations, and phones in correctional institutions that are provided for use by inmates? Commenters should discuss the anticipated declining cost of these technologies, assuming a wide-spread demand for these services.

a) Voice File Technology

There are two types of technological systems that are capable of providing on-demand call rating information. The first type is a voice file system. The voice file

system would work for simple rating systems which are not subject to mileage or time of day ("TOD") sensitivity. Currently, Opticom uses voice file technology to brand its operator service calls. Voice file technology would not require the purchase of any new hardware or software, however, various voice files would have to be developed for each on-demand rate. Individual voice files would cost approximately $500.00 to generate. Although voice file technology could be developed and implemented in less than seven (7) months, voice file technology is limited in its application since most operator service providers ("OSPs") have rating complexities that exceed the capabilities of the voice file technology.

b) Voice Annunciator Technology

The second type of system is that of voice annunciators or text-to-speech converters. This technology would eliminate the need to use pre-recorded voice files and would be better suited to the on-demand application. This is the same technology used for annunciating numbers at the end of a directory assistance call. The technology is fairly mature and well suited for the purpose of providing on-demand call rating information.

Voice annunciator technology requires both software development and hardware implementation. The amount of development and implementation of the technology is dependent upon the homogeneousness of the existing voice platform. Companies with one switching and voice platform would require software development for only one hardware platform and would require only a single implementation of the system. It is probable that most alternative OSPs have only one switching and voice platform. Larger OSPs, however, may have disparate switching and voice platforms that would require a hardware and software solution for each existing platform.

In order to provide on-demand call rating information, the current call flow of every single terminating attempt would be altered to include such information prior to call completion. All the events of the call (*i.e.*, auto operator, live operator, out trunk seizure, etc.) would have to be tracked in real time for each call so the proper surcharge could be quoted after doing a database dip to a table of products the OSP supports. The time zone adjustment and mileage band calculation would also have to be performed from V&H tables (another database dip) so proper minutes of use can be quoted if the product is TOD and mileage sensitive. The voice path of the call and all data resulting from these calculations would have to be routed to an annunciator for on-demand call rating. The call would then resume its normal flow to termination for most call types, or response and bridging for collect call types.

There are two major areas of costs associated with on-demand call rating provided by annunciator systems. The first is hardware costs and the second is software development. Hardware costs will vary based on the size of the OSP. The first hardware

cost is voice annunciators. The number of required annunciator units depends upon the volume of termination attempts. Some OSPs with fewer product choices may be able to use traffic engineering principles to annunciate the rate to more than one caller at a time since many of the simultaneous messages are likely to be the same.

Another hardware component needed is a host computer system that would house the product rates, and tables necessary for TOD and mileage calculations. These would be accessed through the annunciators' communications cards. There are various choices in selecting the hardware that would be required to act as the host computer.

As to the software development, Opticom estimates that it will take approximately two man years. For these reasons, Opticom is confident that on-demand call rating may be implemented at a reasonable cost and in a timely manner.

3. Are there any telecommunications markets outside of the U.S. that already make use of price disclosure prior to call completion, for example, in the U.K.? If so, please provide the technological and financial details behind the implementation of these services and any indication as to the cost and benefits from the perspective consumers.

Opticom is unaware of any telecommunications markets outside the U.S. that already make use of price disclosure prior to call completion. However, many international telecommunications markets no longer utilize traditional coin operated pay-telephones due to payphone coin theft. Countries such as France, Germany and Japan now require that callers, using a pay-telephone, purchase a pre-paid calling card. In such instances, consumers are informed as to the price of the call at the time of purchase.

4. Some commenters have claimed that price disclosure prior to call completion would create an unacceptable delay to consumers. Are there any studies that substantiate or dispute this contention and are those studies available? Are there any studies available that provide indications of consumer satisfaction or dissatisfaction with 0+ services provided in this fashion?

Opticom asserts that on-demand call rating would delay the call by approximately twelve (12) seconds. The majority of this time is necessary for the communication of the rate to the consumer. Opticom suggests that a system could be developed which would allow a consumer to bypass or opt out of the on-demand call rating if they so desired. This type of system would allow consumers who regularly use payphones and know the rates to use the phones without delay.

Opticom knows of no study which tracks consumer satisfaction or dissatisfaction with the delays associated with on-demand call rating.

5. If some or all of embedded base equipment and software are incapable of providing audible notice to consumers for on-demand call rating, what time period would be reasonable for substituting equipment and software that is capable of doing so?

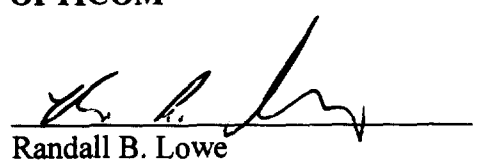
Opticom estimates that it will take approximately two man years to implement on-demand call rating. Implementation will require a team of at least two (2) people working between eight (8) and eighteen (18) months.

6. What percentage of interstate 0+ calls do calls from correctional institutions constitute, both in quantity and dollar volume, over the least 5 years?

For Opticom, correctional institutions constitute less than two percent (2%) of its calls and less than two percent (2%) of its dollar volume. Correctional institutions, on the average, have a high percentage of incomplete calls. In fact, the rate of completion for a correctional institution is typically half of any other type of OSP business. When a call from a correctional institution is completed, the call lasts twice as long as any other call type.

Respectfully submitted,

One Call Communications, Inc. d/b/a OPTICOM



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